

October 12, 2006

BY ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

RE: CC Docket No. 99-200, Number Resource Optimization

Dear Ms. Dortch:

NeuStar, Inc., in its role as the North American Numbering Plan Administrator (“NANPA”), responds to the October 4, 2006 letter from Intratel, LLC (“ILLC”) requesting special temporary authority (“STA”) to allow it to obtain numbering resources directly from the NANPA or the National Pooling Administrator for use in its planned release of its “follow me” Personal Communications Service (“PCS”).<sup>1</sup>

NANPA, as a neutral third-party administrator, has no opinion regarding ILLC’s request for an STA. NANPA takes this opportunity to clarify that NANPA makes numbering resource assignments pursuant to Federal Communications Commission regulations which require NANPA “assign and administer NANP resources ... consistent with industry-developed guidelines and Commission regulations.”<sup>2</sup> On September 27, 2005, ILLC applied for 500 PCS resources using an Operating Company Number assigned to an

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<sup>1</sup> Letter to Jeremy Marcus, Acting Division Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, FCC, from Robert L. Kinkle, Executive VP, General Counsel, Intratel, LLC (Oct. 4, 2006) (“ILLC Letter”).

<sup>2</sup> 47 C.F.R. §52.13(b). To clarify, NANPA does not “define[] the criteria for Personal communication services and 500-NXX Assignments....” ILLC Letter at 1. The language quoted by ILLC from NANPA’s website is a summary from the industry guidelines and is offered for informational purposes for prospective applicants. The NANPA website provides a link to the industry guidelines.

Internet-protocol enabled service provider and in the “Description of Service” field of the application, ILLC indicated that the requested numbering resource would be used to provide voice over Internet protocol type services. On September 30, 2005, NANPA denied ILLC’s application. In order to obtain numbering resources from NANPA, FCC rules and industry guidelines require an applicant to be authorized to provide service in the area for which the numbering resource is being requested.<sup>3</sup> The application did not provide evidence of such authorization.<sup>4</sup> Therefore, in accordance with FCC rules, NANPA denied ILLC’s application.

Respectfully submitted,

/s/ Kimberly Miller

Kimberly Wheeler Miller  
Director, Regulatory Law & Public

Policy

External Affairs

cc: Robert L. Kinkle

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<sup>3</sup> 47 C.F.R. §52.15(g)(2)(i). See also *Personal Communications Services N00 NXX Assignment Guidelines*, §2.9, 4.2, INC 95-0407-009 (August 2002).

<sup>4</sup> See *Administration of the North American Numbering Plan*, Order, CC Docket 99-200, FCC 05-20 (rel. Feb. 1, 2005).